

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-11195-SHS-OTW

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Elana Nightingale Dawson, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, OpenAI Holdings, LLC (together, “OpenAI”).

I am a member in good standing of the Bars of the State of Illinois and the District of Columbia, and certificates of good standing are attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

[Signature on Following Page]

Dated: June 6, 2024
Washington, D.C.

Respectfully Submitted,
LATHAM & WATKINS LLP

/s/ Elana Nightingale Dawson

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Attorneys for OpenAI